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15 Attorneys for Plaintiff City of Oakland

16 UNITED STATES DISTRICT COURT  
17  
18 NORTHERN DISTRICT OF CALIFORNIA

19 CITY OF OAKLAND,

20 Plaintiff,

21 v.

22 ERIC HOLDER, Attorney General of the  
23 United States; and MELINDA HAAG,  
24 U.S. Attorney for the Northern District of  
California,

25 Defendants.

CASE NO. CV 12-5245 MEJ

Related Cases: No. CV 12-3566 MEJ  
No. CV 12-3567 MEJ

**JOINT STIPULATION AND ~~[PROPOSED]~~  
ORDER CONTINUING HEARING ON  
PLAINTIFF CITY OF OAKLAND'S  
MOTION TO STAY FORFEITURE  
PROCEEDINGS PENDING APPEAL**

Date: June 20, 2013

Time: 10:00 a.m.

Court: Hon. Maria-Elena James

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff City of Oakland (“Oakland”) and Defendants US Attorney General Eric Holder and US Attorney Melinda Haag (“Defendants”) (collectively, “the Parties”) hereby stipulate as follows:

WHEREAS, on February 27, 2013, Oakland filed its Motion to Stay Forfeiture Proceedings Pending Appeal (“Motion”) and noticed its Motion to be heard on April 4, 2013 at 10:00 a.m.;

WHEREAS, on March 13, 2013, Defendants filed their Opposition to Oakland’s Motion;

WHEREAS, on March 20, 2013, Oakland filed its Reply to Defendants’ Opposition to Oakland’s Motion;

WHEREAS, on March 28, 2013, the Court *sua sponte* continued the hearing to April 18, 2013, at 10:00 a.m. and vacated the Case Management Conferences in the forfeiture proceedings (Case Nos. 12-3566 and 12-3567);

WHEREAS, Cedric Chao, lead counsel for Oakland, will be out of the country on April 18, 2013, on a pre-planned business trip;

WHEREAS, Kathryn Wyer, counsel for Defendants, is available on April 18, 2013, but will be unavailable during May and the first half of June 2013 due to a two-week trial in another matter currently scheduled for June 3, 2013, and related pretrial briefing and trial preparation;

WHEREAS, the Parties have met and conferred and have agreed to reschedule the hearing date on Oakland’s Motion for June 20, 2013; and

WHEREAS, the requested time modification will have no effect on any other date in the schedule for the above-captioned case.

IT IS HEREBY AGREED AND STIPULATED by and between the Parties that the hearing on Oakland’s Motion shall be rescheduled to June 20, 2013, at 10:00 a.m.

I, Cedric C. Chao, hereby attest under penalty of perjury that I have received concurrence in the filing of this document from the other signatory listed below.

1 Dated: April 12, 2013

Respectfully submitted,

2 DLA PIPER LLP (US)

3 OAKLAND CITY ATTORNEY

4  
5 By: /s/ Cedric C. Chao

6 Cedric C. Chao

7 Attorneys for Plaintiff  
8 CITY OF OAKLAND

9 Dated: April 12, 2013

Respectfully submitted,

10 STUART F. DELERY

Acting Assistant Attorney General

11 ARTHUR R. GOLDBERG

Assistant Director, Federal Programs Branch

12  
13 /s/ Kathryn L. Wyer

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16 *Attorneys for the Defendants*

17  
18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19  
20 April 15, 2013

21 Date

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HONORABLE MARIA-ELENA JAMES